

SHAW KELLER

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August 26, 2022

BY CM/ECF

The Honorable Christopher J. Burke
U.S. District Court for the District of Delaware
844 North King Street
Wilmington, DE 19801

Re: *Advanced Cluster Systems, Inc. v. NVIDIA Corp.*, C.A. No. 19-2032-MN-CJB

Dear Judge Burke:

Advanced Cluster Systems, Inc. (“ACS”) writes to request the scheduling of a discovery teleconference.

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a verbal meet-and-confer by telephone on the following date:

August 26, 2022:

Delaware Counsel: Karen E. Keller, Shaw Keller (Advanced Cluster Systems);
Nathan R. Hoeschen, Shaw Keller (Advanced Cluster Systems); and
Stephanie E. O’Byrne, DLA Piper (NVIDIA)

Lead Counsel: Stephen Larson, Knobbe Martens (Advanced Cluster Systems);
Cheryl T. Burgess, Knobbe Martens (Advanced Cluster Systems);
Ben K. Shiroma, Knobbe Martens (Advanced Cluster Systems);
Clayton Thomson, DLA Piper (NVIDIA); and
Peter F. Nelson, DLA Piper (NVIDIA)

The dispute requiring judicial attention is listed below:

1. ACS’s deposition Topics 1 and 8.

ACS respectfully requests the Court schedule a hearing at its earliest convenience. Fact discovery is scheduled to close on August 26, 2022, and ACS’s invalidity contentions are due next Thursday September 1, 2022.

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Respectfully submitted,

/s/ Nathan R. Hoeschen

Nathan R. Hoeschen (No. 6232)

cc: Clerk of the Court (by CM/ECF)
Counsel of Record (by CM/ECF and electronic mail)